

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO

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CLERK'S OFFICE
U.S. DISTRICT COURT
SAN JUAN, P.R.

In re:
THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

Plaintiff,

As representative of

THE COMMONWEALTH OF PUERTO RICO

Debtor¹

CIVIL NO.: 17-BK-03283-LTS

PROMESA²

TITLE III

**RESPONSE AND RESERVATION OF RIGHTS IN OPPOSITION TO THE FORTY-EIGHTH
OMNIBUS OBJECTION (NON-SUBSTANTIVE) OF THE COMMONWEALTH OF PUERTO
RICO TO SUBSEQUENTLY AMENDED CLAIMS [ECF NO. 7275]³**

TO THE HONORABLE COURT:

COMES NOW creditor **Lizandra Carrero Avilés, OWN RIGHT**, and respectfully responds in opposition to the Forty Eighth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico to Subsequently Amended Claims [ECF No. 7275] (the "Forty Eighth Omnibus Objection"), and states and prays as follows:

1. The Commonwealth of Puerto Rico ("Debtor") has objected to some of creditor **Lizandra Carrero Avilés** timely filed proofs of claim as amended.

¹ The Debtors in these Title III Cases, along with each Debtor's respective Title III case number and the last four (4) digits of each Debtor's federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the "Commonwealth") (Bankruptcy Case No. 17 BK 3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation ("COFINA") (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority ("HTA") (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico ("ERS") (Bankruptcy Case No. 17 BK 3566-LTS) (Last Four Digits of Federal Tax ID: 9686); and (v) Puerto Rico Electric Power Authority ("PREPA" and together with the Commonwealth, COFINA, HTA, and ERS, the "Debtors") (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² PROMESA is codified at 48 U.S.C. §§ 2101-2241.

³ All ECF citations refer to documents filed in Bankruptcy Case No. 17 BK 3283-LTS.

2. **Lizandra Carrero Avilés** has filed two proofs of claim pertaining to damages claimed on behalf of her child and herself in the pending State Court case Rosa Lydia Vélez vs ELA, KPE 1980-1738: Claim No. 32892 by itself and in representation of her daughter, and Claim No. 28148 on behalf of her daughter.

3. However, the claim filed by and for her daughter was subsequently amended by Claim No. 79124 only for the purpose of correcting the name of the minor to read A.I.O.C. instead of her full name.

4. That the claim that should or should have been dismissed is the Claim No. 28148, which was amended by Claim No. 79124 for the purpose of correcting the minor's name.

5. In Debtor's Forty Eighth Omnibus Objection, Exhibit A, No. 92, Prime Clerk Claim No. 32892, **Lizandra Carrero Avilés** moves the Court to deny Debtor's objection.

6. **Lizandra Carrero Avilés** expressly reserves any rights in connection therewith and requests that, the non-substantive disallowance requested by Debtor should not prejudice **Lizandra Carrero Avilés'** rights and claims, which were and are expressly reserved.

RESPECTFULLY SUBMITTED.

In Rincón, Puerto Rico, on this 8th day of July 2019.

I HEREBY CERTIFY that on this same date that I have personally submitted and notified a true and accurate copy of the preceding document before the Clerk's Office, United States District Court #150 Chardon Avenue, Federal Building, San Juan, Puerto Rico 00918, and served a copy of the same via fax to Counsel for the Oversight Board and to the Creditors' Committee.



Lizandra Carrero Avilés

Creditor

HC 2 Box 5420

Rincón, PR 00677

lizacarrero@gmail.com / 787-340-0274